

U.S. Department of the Interior  
Bureau of Land Management  
Little Snake Field Office  
455 Emerson Street  
Craig, CO 81625

## DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2014-0062-DNA

PROJECT NAME: Peck Mesa Juniper Reduction

LEGAL DESCRIPTION:

COUNTY AND GENERAL LOCATION: The project area is located on Peck Mesa, 6 miles west of Sunbeam, CO in Moffat County.

T7N R97W sections 3 –10, 17

1030 acres BLM

APPLICANT: BLM

**A. Describe the Proposed Action**

In order to maintain and improve greater sage grouse habitat and reduce hazardous fuels, it is proposed to masticate encroaching juniper trees in the Peck Mesa area. The project area consists of flat or slightly rolling terrain dominated by Wyoming sagebrush with a low density of Utah juniper spreading into the proposed treatment areas. This area is mapped as priority sage grouse habitat with one lek in the area. Six treatment units, totaling 1030 acres, are identified on the attached map.

Tree mastication would be done with either a large rubber tired tractor (similar to a skidder) with a 6' - 8' hydraulically powered mowing or mulching head or a tracked unit with a similar masticating head. Whole trees would be reduced to small branches and pieces of wood from pencil size up to bowling ball size. The mulch would then be scattered across the surface but would be deeper in the immediate vicinity of the tree. Some hand cutting with chainsaws and scattering the slash may also be done but mechanical mastication is the preferred method. All design features and mitigation specified in environmental analysis DOI-BLM-CO-N010-2014-0039-EA will be followed.



Typical Peck Mesa Treatment Unit.

## **B. Land Use Plan (LUP) Conformance**

LUP Name: Little Snake Record of Decision and Approved Resource Management Plan (RMP)

Date Approved: October, 2011

Final RMP/EIS, August, 2010

Draft RMP/EIS, January, 2007

The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP goals, objectives, and management decisions:

Section/Page:

**Wildland Fire Management** - page RMP-27:

Give first priority to protection of life or property. Objectives for achieving this goal include:



- Identify and reduce hazardous fuels, with an emphasis on urban interface areas. Create an integrated approach to fire and resource management to meet land health standards. Objectives for achieving this goal include:
- Reduce fire hazards in ecosystems and restore ecological community functions.
- Use mechanical or other vegetation treatments to reduce fire hazards, when appropriate.

**Vegetation** – page RMP-15:

Collaborate with stakeholders and resource users in providing an array of habitats, suitably distributed across the landscape, that support biodiversity and viable populations of native plant and animal species. Objectives for achieving this goal include:

- Manage for a diversity of seral stages within plant communities.
- Manage for connections between varieties of plant communities on a landscape scale.
- Manage for juniper and other large woody species within their historic range of natural variability.
- Restore natural disturbance regimes, such as fire, and use vegetation treatments to accomplish biodiversity.

Sustain the integrity of the sagebrush biome in order to support viable populations of greater sage-grouse and other sagebrush obligate species. Objectives for achieving this goal include:

- Maintain large patches of high-quality sagebrush habitats, consistent with the natural range of variability for sagebrush communities in northwest Colorado.
- Maintain connections between sagebrush habitats on a landscape scale, as allowed by the range site condition.

Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages. Objectives for achieving this goal include:

- Reconnect large patches of sagebrush habitat, consistent with the natural range of variability for sagebrush communities in northwest Colorado.
- Reduce the encroachment of juniper and other large woody species into the sagebrush habitat.
- Restore a diversity of seral stages within sagebrush communities.
- Restore the quantity, species composition, and species diversity of sagebrush understories.

**Special Status Species** – page RMP-22:

Sustain the integrity of the sagebrush biome to maintain viable populations of greater sage-grouse and other sagebrush obligate species, consistent with local conservation plans. Objectives for achieving this goal include:

- Maintain large patches of high-quality sagebrush habitats consistent with the natural range of variability for sagebrush communities in northwest Colorado.
- Maintain connections between sagebrush habitats on a landscape scale.

Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages. Objectives for achieving this goal include:

- Reconnect large patches of sagebrush habitat consistent with the natural range of variability for sagebrush communities in northwest Colorado.
- Reduce the encroachment of juniper and other large woody species onto sagebrush habitat.

**C. Identify applicable NEPA documents and other related documents that cover the proposed action.**

DOI-BLM-CO-N010-2014-0039-EA, LSFO Juniper Encroachment Treatment.

The Federal Land Policy and Management Act of 1976, as Amended (43 USC 1752)

Federal Land Assistance, Management and Assistance Act of 2009.

Northwest Colorado Fire Management Program Fire Management Plan, 2014.

**D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?** Yes. The current proposed action is part of the proposed action in the previously approved Environmental Assessment Record, Little Snake Field Office, LSFO Juniper Encroachment Treatment, DOI-BLM-CO-N010-2014-0039-EA.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?** Yes. The Environmental Assessment Record for DOI-BLM-CO-N010-2014-0039-EA analyzed the environmental impacts of the Proposed Action. The Proposed Action in the DNA is a part of the listed activities covered in the EA. The current environmental concerns, interests, and resource values are essentially the same as those analyzed in the EA.

**3. Is the existing analysis valid in light of any new information or circumstances?** Yes. The Proposed Action would have no disproportionate impacts on minority populations or low income communities per Executive Order (EO) 12898 and would not adversely impact migratory birds per EO 13186.

Subject to WO-IM 2011-154 and in accordance with BLM policy, the proposed project areas lie within a polygon that was inventoried for lands with wilderness characteristics (LWC). The polygon did not meet the size criteria (<5,000 acres) to be considered as having the potential as an LWC.

The LSFO is meeting the requirement of Section 201(a) of FLPMA by preparing and maintaining an inventory of potential LWCs; however, no decision has been made to manage



any of the inventoried lands as LWCs, nor has the identification of these polygons changed the management or use of the public lands contained therein.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?** Yes. The Environmental Assessment Record DOI-BLM-CO-N010-2014-0039-EA methodology and analytical approach are appropriate to this Proposed Action.

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?** Yes. Direct and indirect impacts of the Proposed Action are unchanged from those identified in the existing NEPA documents. DOI-BLM-CO-N010-2014-0039-EA analyzed the direct, indirect, and site-specific impacts of the area covered under this present Proposed Action.

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?** Yes. The cumulative impacts that would result from the implementation of the Proposed Action would remain unchanged from those identified in the existing environmental assessment DOI-BLM-CO-N010-2014-0039-EA. No additional activities have been implemented that would change the impacts resulting from the Proposed Action.

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes. Public outreach through scoping and involvement of the public and other agencies occurred during the development of the EA.

#### **E. Interdisciplinary Analysis:**

<b>Title</b>	<b>Resource</b>	<b>Date</b>
Ecologist	Air Quality, Floodplains Prime/Unique Farmlands, Soils, Water Quality – Surface, Wetlands/Riparian Zones	DB 11/10/14
Archaeologist	Cultural Resources, Native American Concerns	BN 10/21/14
Realty Specialist	Environmental Justice	LM 09/29/14
Environmental Coord. NEPA	Hazardous Materials	DB 09/23/14
Rangeland Management Spec.	Invasive Non-native Species	CR 09/29/14
Rangeland Management Spec.	Sensitive Plants, T&E Plant	AH 09/24/14
Wildlife Biologist	T&E Animals	SW 10/06/14
Geologist	Water Quality - Ground	DB

**ATTACHMENT #1**  
**DOI-BLM-CO-N010-2014-0062-DNA**

**Terrestrial wildlife and sensitive species**

**Exhibit LS-101: Elk, Mule Deer, Pronghorn Antelope and/or Bighorn Sheep Crucial Winter Habitat Timing Limitation:**

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Crucial winter habitat will be closed to surface disturbing activities from December 1 to April 30, with the intent that this stipulation apply after the big game hunting season. In the case that hunting season extends later, exceptions will be applied through normal procedures.

**Exhibit LS-102: Greater Sage-Grouse Nesting and Early Brood Rearing Habitat Timing Limitation:**

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Between March 1 and June 30, greater sage-grouse nesting and early brood-rearing habitat will be stipulated as Controlled Surface Use for surface disturbing activities operations within a 4 mile radius of the perimeter of a lek. All surface disturbing activities will avoid only nesting and early brood-rearing habitat within the 4 mile radius of the lek during this time period.



**ATTACHMENT #2**  
**DOI-BLM-CO-N010-2014-0062-DNA**

**Cultural Resources and Native American Concerns**

Federal agencies are mandated by various laws to consider the effect of proposed land use activities on cultural resources (i.e. historic and archaeological sites). The National Environmental Policy Act directs the federal government to preserve important historic and cultural aspects of the national heritage. The National Historic Preservation Act (NHPA) requires federal agencies to take into account the effect of federal undertakings on cultural resources that are eligible for inclusion in the National Register of Historic Places (NRHP). The proposed juniper reduction project is a federal undertaking because it will be funded by the BLM. In Colorado, the requirements of the NHPA are implemented under the terms of the Protocol Agreement between the Bureau of Land Management and the State Historic Preservation Officer. An undertaking may be authorized by a BLM field office if it is determined that there will be “no effect” or “no adverse effect” to eligible sites.

The proposed undertaking will have no effect on sites that are eligible to the NRHP. In September of 2014, a thorough pedestrian “Class III” cultural resource survey was completed on all areas proposed for juniper reduction (McKetta and McKetta 2014). Three archaeological sites determined to be eligible to the NRHP were identified within the juniper reduction areas. The sites are open campsites associated with Native American occupation that have buried, intact archaeological deposits. Archaeological features present have not been dated and no temporally diagnostic artifacts diagnostic were recovered from the sites. Therefore, the sites cannot be assigned to a particular time period or Native American cultural group. The proposed project will be redesigned to avoid the three sites by a distance of 100 meters.

A number of laws direct federal land managing agencies to consider the views of Native Americans as part of the process of making land use decisions. The National Environmental Policy Act directs the federal government to preserve important historic and cultural aspects of the national heritage. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consult with Native Americans regarding the effect of federal undertakings on sites that may be of cultural or religious importance to Indian people to ensure that tribal values are taken into account to the extent feasible.

Based on available information, the proposed juniper reduction project is not expected to affect sites or areas of concern to Native Americans. In historic times, the Little Snake field area was inhabited by the Utes and the Shoshone. Sites of concern to the tribes usually include burials, rock art sites, wickiups, and vision quest sites. No sites of the above-mentioned varieties are known within the area to be affected by the proposed project. Also, the project is not located within an area known to be of concern to the tribes. In May of 2013, the Little Snake Field Office sent letters describing federal undertakings planned for upcoming years to the three branches of the Utes and to the Eastern Shoshone. The letters mentioned proposed projects involving mechanical treatment of areas with encroaching pinyon and juniper. No response to the letters was received. From the above information, it is concluded that the proposed undertaking will not affect sites or areas of concern to Native Americans.



